

Pro Se 7 2016

1      FILED      ENTERED  
2      LODGED      RECEIVED

2      FEB 05 2018      RE

3      AT SEATTLE  
4      CLERK U.S. DISTRICT COURT  
5      WESTERN DISTRICT OF WASHINGTON  
6      DEPUTY  
7      BY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

18-CV-00176 MJP

8      Mark Mayes

9      CASE NO. \_\_\_\_\_

10     [to be filled in by Clerk's Office]

11     COMPLAINT FOR EMPLOYMENT  
12     DISCRIMINATION

13     Jury Trial:  Yes  No

14     Amazon

15     Jeff Bezos

16     Emily Larson

17     Defendant(s).

I. THE PARTIES TO THIS COMPLAINT

A. Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

20     Name      Mark Mayes  
21     Street Address      3405 N.E. 84<sup>th</sup> St  
22     City and County      Seattle, King  
23     State and Zip Code      Washington, 98115  
24     Telephone Number      313.718.3749

Pro Se 7 2016

## 1 B. Defendant(s)

2 Provide the information below for each defendant named in the complaint, whether the  
3 defendant is an individual, a government agency, an organization, or a corporation. For an  
4 individual defendant, include the person's job or title (if known). Attach additional pages if  
needed.

## 5 Defendant No. 1

6 Name

Jeff Bezos

7 Job or Title (if known)

CEO

8 Street Address

21005 64<sup>th</sup> Ave. South

9 City and County

Kent, WA; King

State and Zip Code

WA, 98032

Telephone Number

---

## 10 Defendant No. 2

11 Name

Emily Larson

12 Job or Title (if known)

HR

13 Street Address

21005 64<sup>th</sup> Ave. South

14 City and County

Kent, WA; King

15 State and Zip Code

WA, 98032

16 Telephone Number

---

## 17 Defendant No. 3

18 Name

Aaron Doe

19 Job or Title (if known)

Operations Manager

20 Street Address

21005 64<sup>th</sup> Ave. South

21 City and County

Kent, WA; King

22 State and Zip Code

WA, 98032

23 Telephone Number

---

Pro Se 7 2016

## 1 Defendant No. 4

2 Name

3 Bradley Doe

4 Job or Title (if known)

5 Floor Manager

6 Street Address

7 21005 64<sup>th</sup> Ave. South

8 City and County

9 Kent, King County

10 State and Zip Code

11 WA, 98032

12 Telephone Number

## 13 C. Place of Employment

14 The address at which I sought employment or was employed by the defendant(s) is:

15 Name

16 Amazon Warehouse

17 Street Address

18 21005 64<sup>th</sup> Ave. South

19 City and County

20 Kent, King County

21 State and Zip Code

22 WA, 98032

23 Telephone Number

## 24 II. BASIS FOR JURISDICTION

15 This action is brought for discrimination in employment pursuant to (check all that  
apply):

16 Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

17 (Note: In order to bring suit in federal district court under Title VII, you  
18 must first obtain a Notice of Right to Sue letter from the Equal  
19 Employment Opportunity Commission.)20 Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C.  
21 §§ 621 to 634.22 (Note: In order to bring suit in federal district court under the Age  
23 Discrimination in Employment Act, you must first file a charge with the  
24 Equal Employment Opportunity Commission.)

Pro Se 7 2016



1 Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112  
2 to 12117.  
3

(Note: In order to bring suit in federal district court under the  
Americans with Disabilities Act, you must first obtain a Notice of Right  
to Sue letter from the Equal Employment Opportunity Commission.)



4 Other federal law (specify the federal law):  
5

---



6 Relevant state law (specify, if known):  
7

---



8 Relevant city or county law (specify, if known):  
9

---

### 10 III. STATEMENT OF CLAIM

11 Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as  
12 possible the facts showing that each plaintiff is entitled to the damages or other relief sought.  
13 State how each defendant was involved and what each defendant did that caused the plaintiff  
14 harm or violated the plaintiff's rights, including the dates and places of that involvement or  
conduct. If more than one claim is asserted, number each claim and write a short and plain  
statement of each claim in a separate paragraph. Attach additional pages if needed.

15 \_\_\_\_\_  
16 \_\_\_\_\_  
17 \_\_\_\_\_

18 A. The discriminatory conduct of which I complain in this action includes (check all that  
19 apply):  
20



21 Failure to hire me.



22 Termination of my employment.



23 Failure to promote me.



24 Failure to accommodate my disability.



Unequal terms and conditions of my employment.



Retaliation.

Pro Se 7 2016

1                     Other acts (specify): \_\_\_\_\_

2                    B. It is my best recollection that the alleged discriminatory acts occurred on date(s)

3                    \_\_\_\_\_

4                    C. I believe that defendant(s) (check one):

5                     is/are still committing these acts against me.

6                     is/are not still committing these acts against me.

7                    D. Defendant(s) discriminated against me based on my (check all that apply and explain):

8                     race \_\_\_\_\_

9                     color \_\_\_\_\_

10                    gender/sex \_\_\_\_\_

11                    religion \_\_\_\_\_

12                    national origin \_\_\_\_\_

13                    age (year of birth) (only when asserting  
14                   a claim of age  
discrimination.) \_\_\_\_\_

15                    disability or perceived disability (specify disability) \_\_\_\_\_

16                   E. The facts of my case are as follows. Attach additional pages if needed.

17                   \_\_\_\_\_

18                   \_\_\_\_\_

19                   \_\_\_\_\_

20                   (Note: As additional support for the facts of your claim, you may attach to this complaint  
a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge  
filed with the relevant state or city human rights division.)

Pro Se 7 2016

#### **IV. EXHAUSTION OF FEDERAL ADMINISTRATIVE REMEDIES**

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on *(date)*

JULY 5, 2017

- B. The Equal Employment Opportunity Commission (*check one*):

- has not issued a Notice of Right to Sue letter.

issued a Notice of Right to Sue letter, which I received on (date)

NOV 30, 2017

*(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)*

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct (*check one*):

- 60 days or more have elapsed.
  - less than 60 days have elapsed.

## V. RELIEF

*State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.*

Pain and Suffering: (Continued at the present time; White board calling employer Owner, Actual damages: Ankle injury \$ 300,000 \$. Basis 300,000; is the limit.) Punitive: 6,000,000.

Pro Se 7 2016

**VI. CERTIFICATION AND CLOSING**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 2/5/18

Signature of Plaintiff 

Printed Name of Plaintiff Mark Mayes

Date of signing: \_\_\_\_\_

Signature of Plaintiff \_\_\_\_\_

Printed Name of Plaintiff \_\_\_\_\_

Date of signing: \_\_\_\_\_

Signature of Plaintiff \_\_\_\_\_

Printed Name of Plaintiff \_\_\_\_\_

Mark Mayes

3405 N.E. 84<sup>th</sup> Street Seattle,  
WA 98115

313.718.3749

## Page 4 STATEMENT OF CLAIM

I was hired on or about May 30, 2017 as a picker. My race is African American. At the start of my employment, I was trained by someone who wasn't taught to train. Later, I was targeted after I asked a HR member why she wore a T-shirt that alluded to a derogatory slur "gangster nigger." She was very uncomfortable then got an attitude. Then would whisper to her co-worker and look at me when I walked by. Shortly after, within my first week I got wrote up from Andreus. I continued to feel targeted because of his over aggressive demeanor. He told me I might get fired every time I spoke with him. I told Bradley what happen and I thought it was because of my skin color. I was subjected to harassment and disciplinary write ups every day after that. I received many false readings of my performance. I believe that the reason was my race, African American, because the records was not true. My production was good. I was disciplined more severely than those of non-African American races. I had a floor manager (Aaron) tell me "I'm bright," while pointing at his skin. That was right after a co-worker told me I smell like watermelon while the manager was there. I complained to management that the write ups were not justified under the employer's policies. Managers made more racial remarks. Laughing and humiliating me. They told me sarcastically "hang in there" every day. White managers and HR members (Skylar) told me this while in front of a board that referred to them as "Owner's." The entire time I was working on an ankle that needed screws removed. I was told nothing was wrong and to return to work with a case boot. On June 8, 2017, an HR employee "Emily threatened my life when she told me. "We are gunning on you". While making a gun with her fingers pointing at me. Aaron (operations manager) later told me "I got 14 bullets for you. This has caused continuing emotional pain, suffering, inconvenience, mental anguish, dehumanization, fear, PTSD, post traumatic slave syndrome, humiliation, fainting twice, feeling of estrangement from others since of foreshortened future and loss of enjoyment of life. I was afraid for my life causing me to report the situation to the police. The CEO did not take proper steps to stop the hostile work environment Even after sending emails. Jeff Bezos didn't follow its own policy. After my complaints Andres and Andersen went on paid leave without any apology. I spoke with the top manager in the plant. He told me that he will get me transferred to a different warehouse, and that I didn't have to worry about getting fired. I was later fired for not coming to work.

Mark Mayes

3405 N.E. 84<sup>th</sup> Street Seattle,  
WA 98115

313.718.3749

**Page 5 The facts of my case are as follows. Attached additional page**

I was hired on or about May 30, 2017 as a picker. My race is African American.

1. At the start of my employment, I was trained by someone who wasn't properly taught to train.
2. Later, I was targeted after I asked a HR member why she wore a T-shirt that alluded to a derogatory slur "gangster nigger."
3. Shortly after, within my first week I got wrote up from Andreus. I continued to feel targeted because of his overaggressive demeanor. He told me I might get fired every time I spoke with him.
4. I told Bradley what happen with Andreus and I thought it was because of my skin color. I was subjected to harassment and disciplinary write ups every day after that. I received many false readings of my performance. I believe that the reason was my race, African American, because the records was not true. My production was good. I was disciplined more severely than those of non-African American races.
5. I complained to management and HR that the write ups from both Bradley and Andreus were not justified under the employer's policies. Managers made more racial remarks. Laughing and humiliating me.
6. I complained that I was being harassed daily to HR they were unresponsive and directed me to leave the office on many occasions.
7. White managers and HR member contributed to a racist hostile work environment while in front of a board that referred to them as "Owner's."
8. The entire time I was working on an ankle that needed screws removed. I was told nothing was wrong and to return to work with a case boot.
9. On June 8, 2017, an HR employee "Emily threatened my life when she told me. "We are gunning on you". While making a gun with her fingers pointing at me.
10. Aaron (operations manager) later told me "I got 14 bullets for you. This has caused continuing emotional pain, suffering, inconvenience, mental anguish, dehumanization, fear, PTSD, post traumatic slave syndrome, humiliation, fainting twice, feeling of estrangement from others since of foreshortened future and loss of enjoyment of life. I was afraid for my life causing me to report the situation to the police.
11. The CEO did not take proper steps to stop the hostile work environment Even after sending emails. Jeff Bezos didn't follow its own policy. After my complaints Andres and Andersen went on paid leave without any apology.
12. I spoke with the top manager in the plant. He told me that he will get me transferred to a different warehouse, and that I didn't have to worry about getting fired (We agreed that I didn't have to come back to work for fear of my life.) I was later fired for not coming to work.

Mark Mayes

3405 N.E. 84<sup>th</sup> Street Seattle, Pg Z  
WA 98115

313.718.3749

Defendant(s)

No.5 Aaron Doe

Floor Manager

21005 64<sup>th</sup> Ave. South

Kent, King

Washington, 98032

No. 6 Andreus Floor Manager

Doe

Floor Manager

21005 64<sup>th</sup> Ave. South

Kent, King

Washington, 98032

No. 7 Skylar Doe

HR

Floor Manager

21005 64<sup>th</sup> Ave. South

Kent, King

Washington, 98032

No. 8 Lady with shirt stating (Gangster Napper)

Jane Doe

Floor Manager

21005 64<sup>th</sup> Ave. South

Kent, King

Washington, 98032

I request this case  
is sealed.